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AGUILAR, P.		┢	
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BEAN, C.	1	_	Permitting and Compliance Unit Leader
BUTLER, J. L.	1	<u> </u>	Facilities Program
CERCLA AR (T130G)	İx.	X	
CLARK, D	-	-	
DIETERLE, S.	\vdash	 	Colorado Department of Public Health and the Environment
FRANCIS, M.	1	┝	4300 Cherry Creek Drive South
FREIBOTH, C.	┼	╌	Denver, Colorado 80246-1530
GIBBS, F.	\vdash	 	
GUTHRIE, V.	╀	-	CLOSURE DESCRIPTION DOCUMENT FOR CLOSURE OF UNIT 18.04 – SMN-005-03
HUMISTON, T.	-	 	CLOSURE DESCRIPTION DOCUMENT FOR CLOSURE OF CIVIT 18.04 – SIMIN-003-03
KEHLER, K	╀	<u> </u>	
MARSCHALL, J.R.	₩	-	Dear Mr. Schieffelin:
MARTIN, D.	╀	-	
MYERS, K.	₩	X	Pursuant to the Rocky Flats RCRA Part B Permit (June 1997), Kaiser-Hill Company, L.L.C. and the United States
NESTA, S.		Ιŵ	
NORTH, K.	 ^	-	
	╀	-	for the RCRA Container Storage Unit 18.04, which is anticipated to begin in March 2003.
OLIVER, R.	╄		
OMAN, K.	-	<u> </u>	The Closure Description Document contains a description of the system to be closed, the selected method of closure,
PLAPPERT, R.	-	_	the types of contamination to be addressed and the schedule for closure activities. We request approval of the
PRIMROSE, A.	₩.		Closure Description Document within 30 days of receipt.
ROSENMAN, A.	14	X	Crosure Description Document within 30 days of receipt.
SNYDER, D.P.	▙	<u> </u>	
THOMPSON, J.		_	If you have any questions, please contact Stephen Nesta of Kaiser-Hill Remediation, Industrial D&D, & Site
VANDERPOEE, M.	┺	<u> </u>	Services (RISS) at 303-966-6386.
WIEMELT, K.	ــــ		
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Closure Description Document For RCRA Permitted Container Storage Unit 18.04

U.S. Department of Energy

Rocky Flats Environmental Technology Site

EPA ID No. CO7890010526



TABLE OF CONTENTS

1.0	INTR	ODUCTION	1
	1.1	Purpose and Scope	1
	1.2	Unit Notification and Schedule	1
	1.3	Facility Contacts	1
2.0	MET	HOD OF CLOSURE AND PERFORMANCE STANDARD	1
3.0	SYST	TEM DESCRIPTION AND WASTE CHARACTERIZATION	2
4.0	SPEC	CIFIC CLOSURE ACTIVITIES	2
	4.1	Establish of Treatment System Boundaries and Scope of Removal	2
	4.2	Preparation of Engineering and IWCP Work Packages	3
5.0	DISP	OSTION OF CLOSURE WASTES	3
6.0	SOIL	CONTAMINATION EVALUATION AND POST-CLOSURE CARE	3
7.0	REC	ORDKEEPING	3
8.0	AMEI	NDMENT OF CLOSURE DESCRIPTION DOCUMENT	4
9.0	REFE	ERENCES	4
	ATTA	ACHMENTS	

Closure Description Document for RCRA Permitted Container Storage Unit 18.04

1.0 INTRODUCTION

1.1 Purpose and Scope

Part X of the Rocky Flats Environmental Technology Site's (RFETS) RCRA Part B Permit, addresses closure of permitted storage units. Removal of the storage unit is subject to the Closure Plan, as described in Part X, and to a subsequent Closure Description Document that identifies the portions or sections of the Closure Plan that are applicable to the specific permitted unit closure.

This Closure Description Document applies to Unit 18.04 which comprises seventeen cargo containers, with secondary containment pans and rollers, used for storage of RCRA hazardous waste packaged in drums. Closure of this unit will be accomplished by debris treatment.

1.2 Unit Closure Notification and Schedule

The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division is hereby notified of the Site's intent to conduct closure of the unit identified in Section 4.0. The submittal of this notification is at least 45 days prior to the beginning of closure activities. Closure activities for this unit are expected to begin after March 15, 2003. The identified closure activities are expected to be completed within 180 days. If closure activities cannot be completed within 180 days, a request for extension will be submitted to the Division at least 30 days prior to the end of the 180 days.

Within 30 days after completion of closure activities a summary report will be submitted to CDPHE containing details about the closure of the storage unit.

1.3 Facility Contacts

The contacts for closure activities at RFETS in the Remediation, Industrial D&D, & Site Services project are:

Acting Assistant Manager
For Environmental and Stewardship
Rocky Flats Field Office
U.S. Department of Energy
10808 Highway 93, Unit A
Golden, CO 80403-8200
(303) 966-4765

Environmental Manager Remediation, Industrial D&D, & Site Services Kaiser-Hill Company, L.L.C. 10808 Highway 93, Unit B Golden, CO 80403-8200 (303) 966-6386

2.0 METHOD OF CLOSURE AND PERFORMANCE STANDARD

The components of the storage unit described herein will be closed by the method described as "Debris Rule Decontamination" in the Closure Plan, Section X, of the RCRA Part B Permit. The performance standard is decontamination, removal of decontamination residuals, and visual inspection of the surface of the debris, against the closure performance standard for a "clean debris surface."

3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

This unit was originally permitted in 1995 to include the cargo containers and a facility that would be built for storage of waste. Site management later decided not to construct the building, but chose not to remove the permit modification that approved construction of the facility, in case the building would be needed in the future. This CDD will serve as an administrative closure for the building proposed under RCRA Permit Modification #23, Construction of the Hazardous Waste Storage Building, Unit 18.04, and as the closure document for the cargoes that stored hazardous waste.

The storage unit consists of seventeen cargo containers, used as weather structures, for storage of hazardous waste in drums. The cargoes have secondary containment pans with rollers to allow movement of drums within the secondary containment. The EPA codes this unit is permitted to store are D001-D043, F001–F009, F027, F039, P001-P205, U001-U012, U014-U039, U041-U053, U055-U064, U066- U099, U101-U103, U105-U138, U140-U174, U176-U194, U196, U197, U200-U211, U213-U223, U225-U228, U234-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, and U404. A review of inspection records, spill response records, ECATS, and other site records indicate that there have been spills and releases, from drums, to the secondary containment pans.

4.0 SPECIFIC CLOSURE ACTIVITIES

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures. Closure activities are summarized as follows:

4.1 Establishment of System Boundaries and Scope of Removal

The boundaries for the RCRA unit that will undergo debris rule decontamination include the secondary containment pans and the rollers in the pans. The containment pans and rollers will be rinsed with water and the water will be collected and managed at one of the water treatment units available for wastewater management. After the rinsing of the containment pans and rollers is completed, vacuuming, wiping or other comparable physical means will remove any remaining residuals that may be generated during the decontamination effort. These residuals will be characterized and managed in accordance with 6 CCR 1007-3, Part 268.45(d)(1).

After these steps have been completed, an individual from the RISS Environmental Compliance group will perform a visual inspection against the "clean debris surface" standard, defined as "a surface that, when viewed without magnification, shall be free of all visible contaminated soil or hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discoloration, and soil and waste in cracks, crevices, and pits may be present provided that such staining and soil and waste in cracks, crevices, and pits is limited to no more than 5% of each square inch of surface area." If the "clean debris surface" standard is not achieved, the debris will be managed as hazardous

Closure Description Document for RCRA Permitted Container Storage Unit 18.04

debris; otherwise the debris will be managed as sanitary waste. An independent professional engineer will certify documentation of the inspection.

Since the cargoes themselves, served only as weather containment, they will be surveyed and released under a radiological evaluation (PRE) and sold through PU&D. Radioactive contamination is not expected.

4.2 Preparation of Engineering and IWCP Work Packages

A specific IWCP/engineering work package will be prepared for the closure activities. The RFETS Health and Safety Practices Manual defines general health and safety measures to be followed at the Site. Closure activities will be conducted in accordance with this manual, incorporating the results of job specific industrial and nuclear safety related evaluations and screens.

The IWCP/engineering work package and Radiological Work Permit will be used to control work, including specification of personal protective equipment, methods removal and size reduction, methods for containing any liquids or preventing releases to the environment, and waste packaging. As Low As Reasonably Achievable (ALARA) principles will be followed regarding personnel exposure to radiation.

5.0 DISPOSITION OF CLOSURE WASTES

It is anticipated that metal, rinse water and combustible wastes will be generated during closure activities. It is assumed that the Site waste management systems will be available to receive wastes generated by these closure activities. The liquids generated during the closure activities will be handled as addressed in Section 4.0.

The unit components which may be radioactively contaminated will be managed in accordance with the requirements of the RFETS Radiological Control Manual and Health and Safety Practices Manual, and will be packaged for disposal in accordance with applicable waste acceptance criteria. All debris from this system is expected to be sanitary waste, but if the closure standard is not met the waste will be characterized using this process knowledge and in accordance with applicable regulations.

Wipes, other combustibles used to immobilize free liquids and PPE will be managed as non-routine sanitary waste. All waste containers will be stored in an appropriate onsite storage area prior to offsite disposal.

6.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

Historical information shows no releases occurred to the soil, from the RCRA Storage Unit 18.04, nor is an IHSS or PAC associated with this unit. However, the operating record for the unit addressed in this CDD (e.g., RCRA inspection logs and occurrence reports) indicates that there have been spills or releases to the secondary containment pans of this unit. Closure activities for this unit is not expected to impact the soils surrounding Unit 18.04. Therefore, soil contamination will be evaluated as part of remediation activities for the contractor yard complex under RFCA, and post closure care activities are not necessary as part of the closure of this unit.

7.0 RECORDKEEPING



Closure Description Document for RCRA Permitted Container Storage Unit 18.04

The following closure records will be maintained on Site during closure activities and at a federal repository for a minimum of 30 years following the report of closure:

- Record of sampling activities including type, number and date of samples;
- Analytical results;
- Work instructions used to conduct closure activities and documentation verifying closure activities were conducted in accordance with the RCRA Permit and this Closure Description Document;
- Records of the volume of waste generated during closure.

8.0 AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT

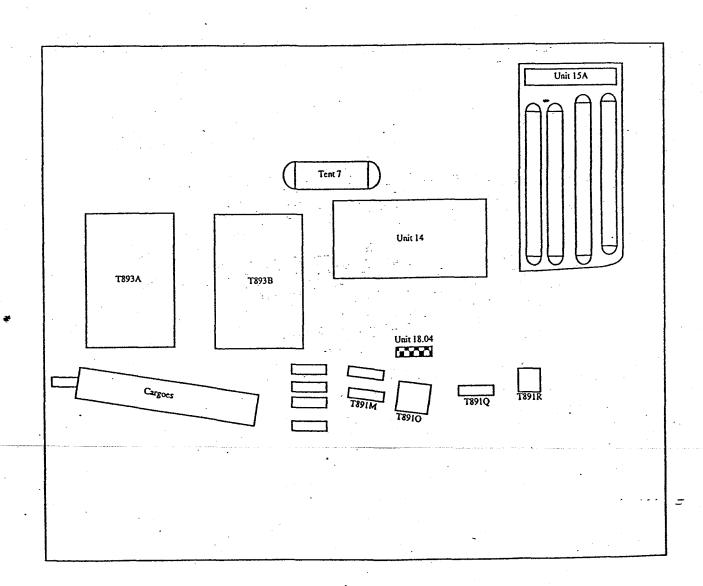
In conducting closure activities, unexpected events that are identified during implementation of closure activities may require an amendment to this Closure Description Document. Modifications to this Closure Description Document will be made in accordance with applicable regulations.

9.0 REFERENCES

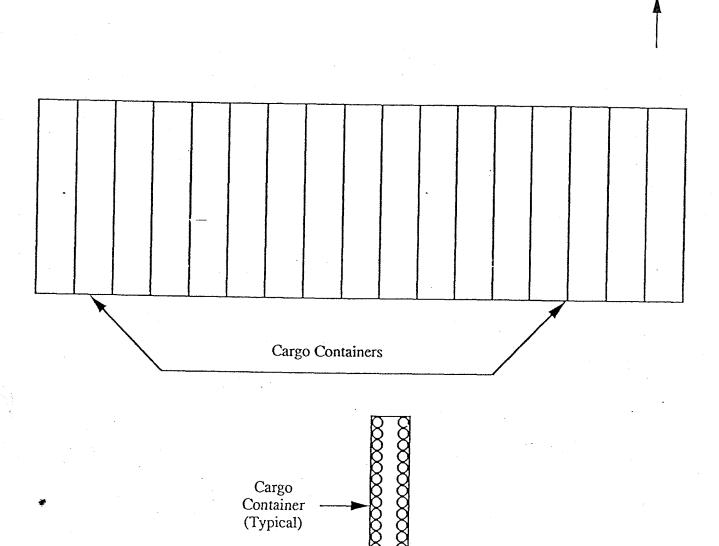
- 1. <u>Code of Colorado Regulations</u>, Vol. 6, No. 1007-3.
- 2. <u>Rocky Flats Environmental Technology Site RCRA Permit,</u> Part X: Closure, effective 6/30/1997.
- 3. Rocky Flats Cleanup Agreement, effective July 1996.

RCRA Unit 18.04 Container Storage Area
Location Map





RCRA Unit 18.04 Containers Storage Area



NOTES:

1) Typical container layout, actual arrangement may vary.